Mr. Jim Shafer
Fiber-Tron, Inc.
29877 US 33 West
Elkhart, IN 46516

Re: 039-12870
First Significant Permit Modification to
Part 70 No.: T 039-6337-00152

Dear Mr. Shafer:

Fiber-Tron, Inc. was issued a permit on December 31, 1998 for a stationary van and recreational vehicle fiberglass parts manufacturing operation. A letter requesting changes to this permit was received on October 19, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The significant permit modification consists of replacing one (1) of the spray guns in the lamination booth with a flow-coater. In addition, the source also requests to add three (3) air-assisted airless spray guns to the gelcoat booth for color changes only.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
NLJ
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Fiber-Tron, Inc.
29877 US 33 West
Elkhart, Indiana 46516

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6337-00152	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: December 31, 1998
First Administrative Amendment No.: T039-10609	Pages Affected: 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: March 23, 1999
First Significant Permit Modification No.: T039-12870	Pages Affected: 4 and 28
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary van and recreational vehicle fiberglass parts manufacturing source.

Responsible Official:	Bill McCaslin
Source Address:	29877 US 33 West, Elkhart, Indiana 46516
Mailing Address:	29877 US 33 West, Elkhart, Indiana 46516
SIC Code:	3714
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) gel resin coating station, identified as SG1, using a maximum of 30 pounds of gel resin per hour, equipped with an air-assisted airless spray application system containing four (4) spray guns and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S1;

(b) One (1) lamination station, identified as SG2, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with an air-assisted airless spray application system containing one (1) fiberglass chop resin spray gun, one (1) flow-coater and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S2;

(c) One (1) paint spray booth, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with an high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3; and

(d) One (1) trimming station rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse identified as DC-1 for particulate matter control, exhausting at one (1) stack identified as PM-1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Descriptions [326 IAC 2-7-5(15)]:

(a) One (1) gel resin coating station, identified as SG1, using a maximum of 30 pounds of gel resin per hour, equipped with an air-assisted airless spray application system containing four (4) spray guns and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S1;

(b) One (1) lamination station, identified as SG2, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with an air-assisted airless spray application system containing one (1) fiberglass chop resin spray gun, one (1) flow-coater and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S2;

(c) One (1) paint spray booth, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with an high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3; and

(d) One (1) trimming station rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse identified as DC-1 for particulate matter control, exhausting at one (1) stack identified as PM-1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for gel resin coating station SG1 and lamination station SG2 shall be as follows:

(a) The gel resin spraying at station SG1 shall utilize an air-assisted airless spray application system.

(b) The fiberglass chop resin spraying at station SG2 shall utilize an air-assisted airless spray application system and one (1) flow-coater.

(c) Only non-VOC containing solvents shall be used at stations SG1 and SG2.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The volatile organic compounds (VOC) input to paint spray booth SG3, including VOC solvent usage, minus the VOC solvent shipped out, shall be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) shall not apply to facility SG3.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for the First Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Fiber-Tron, Inc.
Source Location:	298 US West, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	3714
Operation Permit No.:	T 039-6337-00152
Operation Permit Issuance Date:	December 31, 1998
First Significant Permit Modification No.:	T 039-12870-00152
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed a modification application from Fiber-Tron, Inc. relating to the operation of a van and recreational vehicle fiberglass parts manufacturing source.

History

On October 19, 2000, Fiber-Tron, Inc. submitted an application to the OAM requesting to replace one (1) of the spray guns in the lamination booth with a flow-coater. In addition, the source also requests to add three (3) air-assisted airless spray guns to the gelcoat booth for color changes only. Fiber-Tron, Inc. was issued a Part 70 permit on December 31, 1998. On March 23, 1999, Fiber-Tron, Inc. was issued their First Administrative Amendment (039-10609-00152.

Existing Approvals

The source was issued a Part 70 Operating Permit (T039-6337-00152) on December 31, 1998. The source has since received the following:

(a) First Administrative Amendment No.: 039-10609, issued on March 23, 1999.

Recommendation

The staff recommends to the Commissioner that the First Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 19, 2000.

Changes Proposed

The Office of Air Management (OAM) has reviewed an application from Fiber-Tron, Inc., relating to a permit modification to their existing Part 70 Operating Permit. The significant permit modification consists of replacing one (1) of the spray guns in the lamination booth with a flow-coater. In addition, the source also requests to add three (3) air-assisted airless spray guns to the gelcoat booth for color changes only. The source is proposing the following changes (changes are bolded and stricken out for emphasis):

1. Section A.2, Emission Units and Pollution Control Equipment Summary listed on page 4 of 37, is revised to reflect the addition of three (3) spray guns to the gelcoat booth for color changes and the replacement of one spray gun to a flow-coater in the lamination booth. The revision is as follows (changes are bolded and stricken out for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) gel resin coating station, identified as SG1, using a maximum of 30 pounds of gel resin per hour, equipped with an air-assisted airless spray application system containing ~~one (1)~~ **four (4)** spray gun**s** and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S1;

(b) One (1) lamination station, identified as SG2, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with an air-assisted airless spray application system containing ~~two (2)~~ **one (1)** fiberglass chop resin spray gun~~s~~; **one (1) flow-coater** and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S2;

(c) One (1) paint spray booth, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with an high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3; and

(d) One (1) trimming station rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse identified as DC-1 for particulate matter control, exhausting at one (1) stack identified as PM-1.

2. Section D.1, Facility Description listed on page 28 of 37, is revised to reflect the addition of three (3) spray guns to the gelcoat booth for color changes and the replacement of one spray gun to a flow-coater in the lamination booth. The revision is as follows (changes are bolded and stricken out for emphasis):

Facility Descriptions [326 IAC 2-7-5(15)]:

(a) One (1) gel resin coating station, identified as SG1, using a maximum of 30 pounds of gel resin per hour, equipped with an air-assisted airless spray application system containing ~~one (1)~~ **four (4)** spray gun**s** and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S1;

(b) One (1) lamination station, identified as SG2, using a maximum of 234.5 pounds

of fiberglass chop resin per hour, equipped with an air-assisted airless spray application system containing ~~two (2)~~ **one (1)** fiberglass chop resin spray guns~~,~~ **one (1) flow-coater** and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S2;

(c) One (1) paint spray booth, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with an high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3; and

(d) One (1) trimming station rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse identified as DC-1 for particulate matter control, exhausting at one (1) stack identified as PM-1.

3. Condition D1.1, Volatile Organic Compounds (VOC) [326 IAC 8-1-6] listed on page 28 of 37, is revised to reflect the replacement of one (1) of the spray guns with a flow-coater for the lamination booth which is designated as SG2. Based on "Unified Emission Factors for Open Molding Composites" emission factors, the addition of the flow-coater does not increase VOC emission, but decreases emissions for the lamination booth. Since this method of application is more stringent than the current method, this change is not considered a modification nor a relaxation to the 326 IAC 8-1-6 determination. The revision is as follows (changes are bolded and stricken out for emphasis):

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for gel resin coating station SG1 and lamination station SG2 shall be as follows:

(a) The gel resin spraying at station SG1 shall utilize an air-assisted airless spray application system.

(b) The fiberglass chop resin spraying at station SG2 shall utilize an air-assisted airless spray application system **and one (1) flow-coater**.

(c) Only non-VOC containing solvents shall be used at stations SG1 and SG2.

Emission Calculations

Since this request involves no change in the potential to emit, there are no emissions calculations.

Potential To Emit

The potential to emit of the source will not increase based on the following:

1. Because the three (3) new spray guns will only be used to reduce time and acetone usage during color changes, the potential to emit will not increase since there will not be an increase in the usage; and

2. The existing lamination booth currently consists of two (2) air-assisted airless spray guns. The source request that one (1) of the air-assisted airless spray guns be replaced with a flow-coater. Pursuant to 326 IAC 1-2-23.5, an emission unit is defined as "any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant under the Clean Air Act (CAA)". Based on this definition, the lamination booth is considered an emission unit which contains various spray guns. By replacing

one of the spray guns with a flow-coater, the source is modifying an existing emission unit.

Based on emission factors from the "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, April 20, 1999, the emission factor for a flow-coater application is less than the emission factor for an air-assisted airless spray gun. Therefore, the potential to emit will not increase. Since this modification does not increase the potential to emit and the method of application is more stringent than the current method, this change is not considered a modification nor a relaxation to the 326 IAC 8-1-6 determination. Therefore, the requirements of 326 IAC 2-7-10.5 (Source Modifications), are not applicable.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. Even though this modification involves revising descriptive information and modifying a BACT determination that will result in a more stringent BACT, this modification is considered significant pursuant to 326 IAC 2-7-12(d) because there is a significant change to the permit condition under D.1.1.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

There are no changes to the Federal rule applicability from the original Part 70 Operating Permit.

State Rule Applicability

There are no changes to the Federal rule applicability from the original Part 70 Operating Permit.

Compliance Requirements

There are no changes to the Compliance Requirements from the original Part 70 Operating Permit.

Conclusion

The operation of this van and recreational vehicle fiberglass parts manufacturing shall be subject to the conditions of the attached proposed Significant Permit Modification No. *T* 039-12870-00152.